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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

JASON EDWARD ROON,

Defendant.

Case No. 2:22-mj-00768-EJY

**STIPULATION TO CONTINUE
PRELIMINARY HEARING
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Lauren Ibanez, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel Lazo, Assistant Federal Public Defender, counsel for Jason Edward Roon, that the Preliminary Hearing currently scheduled on May 24, 2024, at 4:00 p.m., be vacated and continued to a date and time convenient to the Court, but no sooner than thirty (30) days.

This Stipulation is entered into for the following reasons:

1. Parties are attempting a preindictment resolution. Additional time is needed to obtain preliminary discovery and engage in negotiation discussions.

2. The defendant is in custody and agrees with the need for the continuance.

1 3. The parties agree to the continuance.

2 4. The additional time requested by this stipulation is excludable in computing the
3 time within which the defendant must be indicted and the trial herein must commence pursuant
4 to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under
5 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

6 This is the first request for a continuance of the preliminary hearing.

7 DATED this 16th day of May 2024.

8
9 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

10
11 /s/ *Raquel Lazo*
By _____
12 RAQUEL LAZO
13 Assistant Federal Public Defender

/s/ *Lauren Ibanez*
By _____
LAUREN IBANEZ
Assistant United States Attorney

14
15 IT IS HEREBY ORDERED that the Stipulation to Continue Preliminary
16 Hearing (ECF No. 20) is GRANTED.

17 IT IS FURTHER ORDERED that the preliminary hearing set for May 24, 2024
is VACATED.

18 IT IS FURTHER ORDERED that the preliminary hearing is reset for June 24,
19 2024 at 4 p.m. in Courtroom 3D.

20 Dated this 16th day of May, 2024.

21
22 
23 ELAYNA J. YOUCRAH
U.S. MAGISTRATE JUDGE